

EXHIBIT A

Map provided on page 167 of

<https://mountaيرesettlement.com/pdf/Cuppels-v-Mountaire-Mtn-for-Final-with-ex.pdf>

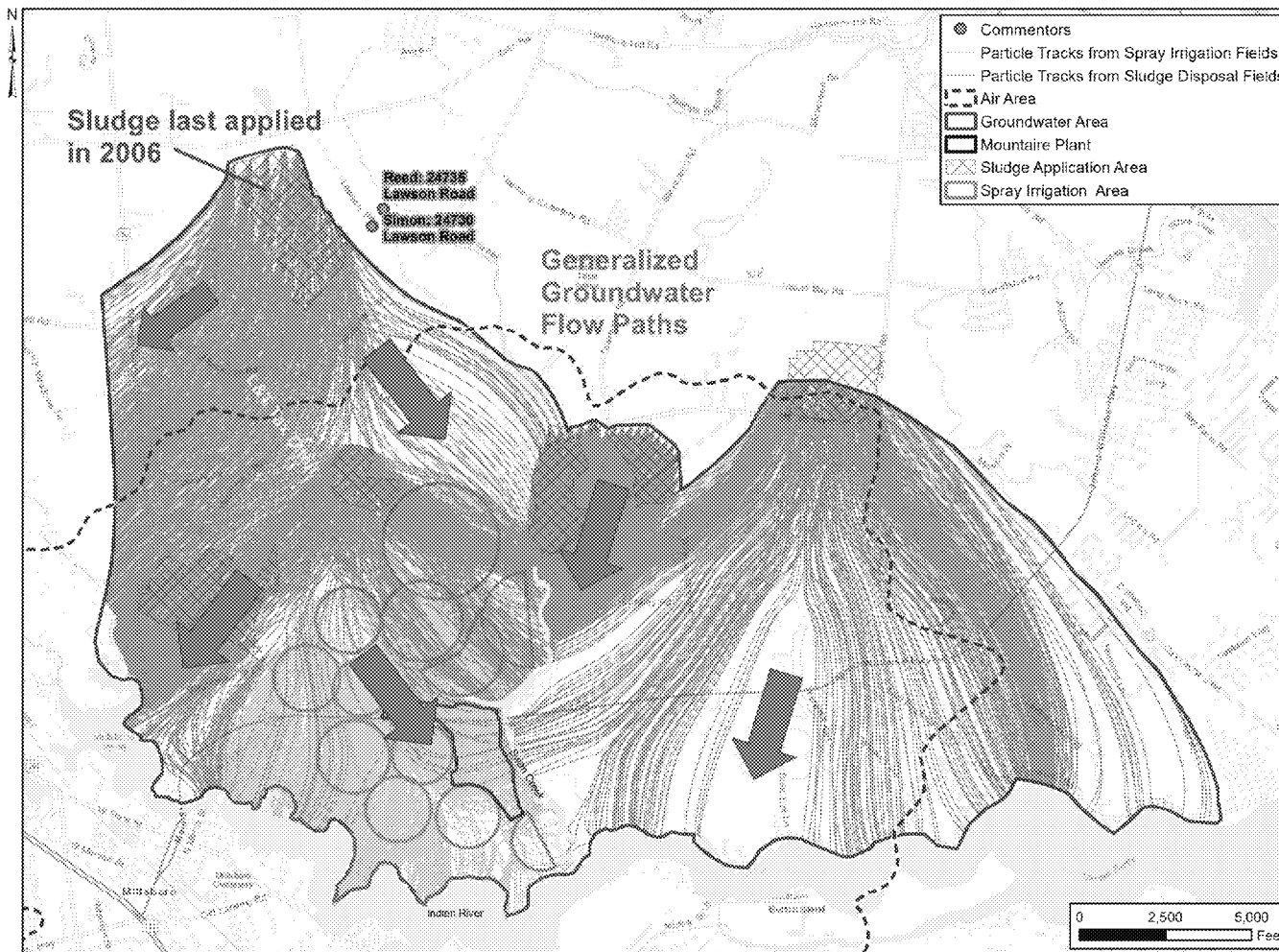
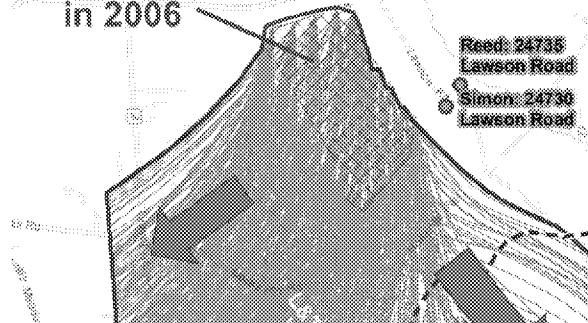


EXHIBIT B

Inset of map.

Alleged date of last
sludge dump was 2006

Sludge last applied
in 2006



Ex. 6 Personal Privacy (PP) said he is willing to discuss this matter with officials Ex. 6 Personal Privacy (PP) is the son of Ex. 6 Personal Privacy (PP) who live at Ex. 6 Personal Privacy (PP) d. (Identified on the map.) As a child he hunted throughout the section of woods within the region between Lawson Rd., Hollyville Rd., Mount Joy Rd., Gravel Hill Rd. (Rt. 30), and Zoar Rd. (the northernmost woods). He first started going into the woods in 2007/2008 and the site remained active until 2010/2011. He was given permission to go into the woods but was later issued a ticket for trespassing without warning. A man named Ex. 6 Personal Privacy (PP) used to give him rides there with a red Dodge 2-door pickup. He also identified another person can also testify as to what he saw. He saw heavy equipment in the woods in a large cleared out area with trucks that had some sort of tank that would hold liquid. He didn't see any liquid, but saw solid waste being dumped that was brownish green. My brother raises chickens and said chicken waste looks like soft-serve ice cream, which Ex. 6 Personal Privacy (PP) agreed with.

When I went into those same woods recently, I saw abandoned mounds throughout the woods. In the center area you'll see in later slides I saw what appeared to be a large area with mounds everywhere and plant growth on them.

In the second area I visited I saw a pond that had very fresh vehicle tracks leading to a pond where it appears liquid was dumped. I saw abandoned piles there as well, but I also saw a small bit of brown dirt with bits of corn. On my second trip back to get photos and samples that dirt was missing, though I got some the first time. The paths appeared to have been further groomed and there was a very large open area with no plant growth whatsoever.

The pine tree growth on paths on other paths leading to the abandoned dump site is inconsistent with the 2006 date.

EXHIBIT C

Recent medical issues of local residents I know of.

Ex. 6 Personal Privacy (PP) (identified on the map at 24730 Lawson Rd.) Satellite imagery shows this has been dump site for many years but starting with the 6/14/2005 satellite image it appears to have started back again. Ms. Simon reported it smells something like tar. She has sought emergency treatment at the hospital within the last several weeks.

- April 2021 – She went to the hospital with severe intestinal pain. This is something that first started around 2006. The description of her symptoms is similar to that I heard from both **Ex. 6 Personal Privacy (PP)** who lives across the street and **Ex. 6 Personal Privacy (PP)**. I purchased her medicine called IBGard for irritable/angry bowel syndrome yesterday that worked for both **Ex. 6 Personal Privacy (PP)** (below). She is feeling better but cannot yet say for certain that medicine is working.
- March 2021 – She went to the emergency room with sinus pain, vertigo, vomiting, and sudden increase in blood pressure.
- 2006 and 2020 – She underwent hysterectomy surgeries
- 1999 – She underwent surgery for gall stones. This is a similar symptom as others I have spoken to who have experienced kidney stones, as well as myself (a single tonsil stone).
- Year unknown (by me) – She underwent a full hysterectomy in her 30s.
- Year unknown (by me) – She developed high blood pressure when she first moved to the property (approximately 20 years ago. I don't remember exactly when.)

Ex. 6 Personal Privacy (PP) husband) started with bronchitis. He worked at Mountaire part time in 2008 and returned from 2015-2018. Starting in 2015 he became oxygen-dependent, though he would not use the oxygen at work. He is now disabled and must be on oxygen at all times.

The **Ex. 6 Personal Privacy (PP)** can fill you in on other medical issues their family are experiencing. I have not received permission to disclose that information so you will need to discuss it with them.

Ex. 6 Personal Privacy (PP) – 302-359-3223 (identified on the map at 24735 Lawson Rd.) has also sought emergency treatment at the hospital.

- August 2019 – He fell over in his yard from vertigo and laid there for 45 minutes before making his way inside. It didn't subside for three days so he went to the hospital. The doctors told him it was likely due to a sudden decrease in potassium levels. To this day he cannot be outside of his home without taking potassium levels or his muscles cramp up **Ex. 6 Personal Privacy (PP)** has a physically demanding job and this only occurs at his home.
- April 2020 – He developed an infection in his face that blew it up to twice its normal size. He was admitted to the hospital for three days.
- October 2020 – He developed intestinal issues including abnormal amount of bloating that distended his stomach. His describing is similar to both **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP) – 302-857-9259 (she lives one mile southeast of Inland Bays wastewater facility downstream toward Indian River.

- Starting around four years ago when she moved into her home she began to experience similar intestinal issues as **Ex. 6 Personal Privacy (PP)**. The medicine is working.

There are four other locals I've spoken to who I have not yet received permission to give you their contact information. One has similar intestinal problems. One has ulcerative colitis (which first occurred in around 2015. This is a condition that general presents itself between at 15-25. I believe he is in his mid-60s. I also met two others who have had multiple cancers and suffered strokes, both conditions occurred to people who lived on my street when Mountaire was alleged to have dumped. There is also another nearby neighbor who suffered very serious medical issues last year until her water was treated, including vertigo, uncontrolled diarrhea, spontaneous bleeding all over her body, and congestive heart failure. She also suffered multiple life-threatening injuries during the alleged dumping by Mountaire. In February of this year another nearby neighbor unexpectedly died of heart failure after experiencing a rapid heart rate, something I experienced prior to getting treated water.

There are many other medical conditions that happened to nearby residents when the alleged dumping occurred, but these are the new conditions I have witnessed with locals I know and have met.

EXHIBIT D

Legal circumstances surrounding the Lawson Rd. active dump next to the [Ex. 6 Personal Privacy (PP)] property.

As you know, three EPA cases have been filed regarding this site. My case involves others, but all three cases specifically identified this property.

When [Ex. 6 Personal Privacy (PP)] called the EPA they took down her name and contact information. After three days of waiting, she called again at the same time I sent my email to the Secretary Garvin (DNREC), Attorney General Jennings, and Governor Carney. Within an hour people from DNREC arrived with a combination to the lock. I misspoke in an early conversation when I said one of the individuals had shirt with “Sherriff” written on it. [Ex. 6 Personal Privacy (PP)] cleared it up with me and said that it was a shirt with the word “Sergeant”, which she believes was his name.

I subsequently called the constable’s office to tell them about what is going on at that property. I was told by the agent who visited the property that she had been to that property numerous times and said they were granted hand-written permission to break up concrete by a previous director of Planning and Zoning, Lawrence Lank. Mr. Lank retired December 1, 2016. When I asked if they would need a permit, I was told they would likely need a “special use permit”.

I understand this sounds like local problems, but it involves Federal crimes. First, there is the satellite image of active dumping. However, I subsequently returned to that property and looked around and found a large mound of dirt there with the channel cut into it heading directly to the pond. There is no other purpose for that channel than to dump liquid. Either the DNREC team that visited that site failed to notice the obvious or they saw it and let it go.

Mr. Rogers informed me that, even though these are Federal crimes, it is up to the State to resolve them unless there are people sustaining injury. That is happening and someone needs to put an end to it.

I spoke with someone from a local conservation agency who acknowledged the issues with the Inland Bays wastewater facility. There is a massive amount of development happening in our area. The wastewater is also being taken here from nearby Rehoboth Beach as well. If the State cannot afford to manage that facility properly or bring it up to speed, then the Federal government needs to do something about it. People here should not be forced into drinking poison simply because the state is granting too many building permits and/or cannot manage the waste generated from that properly. There is a plan in place to double the capacity of that facility, which is great so long as they do it properly, but we can’t wait that long. People are being injured and dying now.

Not to tell anyone how to do their jobs, but money is falling from the skies right now to fix our broken infrastructure. President Biden campaigned on stopping corporations from dumping near minority communities. Not only did they just do it EGREGIOUSLY in his own back yard, we literally have his human waste transported to a failing treatment facility by our homes and we are one well water. Please, ask the head of the EPA to see if he can’t get some attention to deal with this before more people die.

EXHIBIT E

Satellite image dated 6/13/2018 with inset showing active dumping.



Ex. 6 Personal Privacy (PP) home

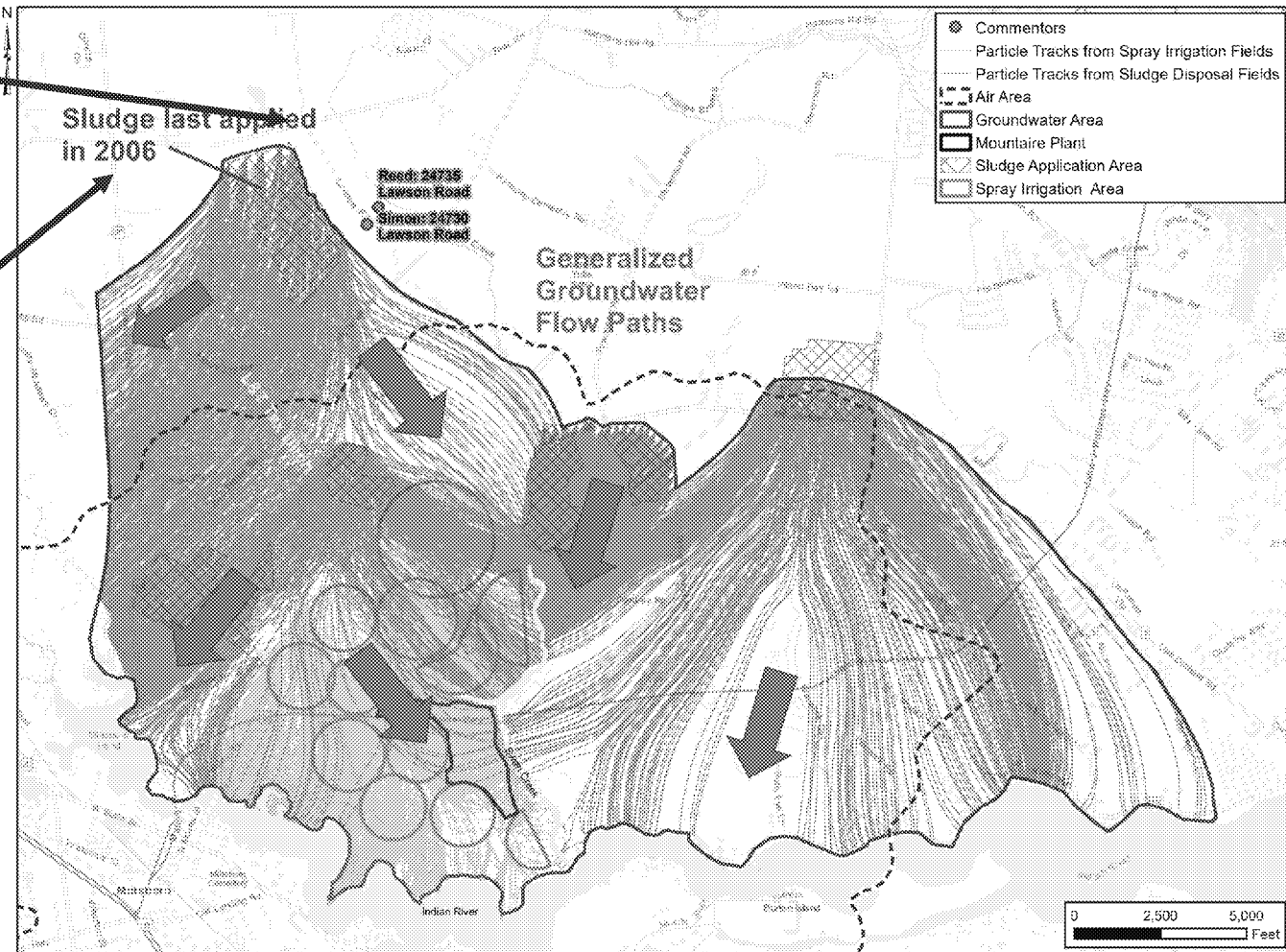
EXHIBIT F-1

Map provided on page 167 of

<https://montaieresettlement.com/pdf/Cuppels-v-Mountaire-Mtn-for-Final-with-ex.pdf>

Corner of
Zoar Rd. and Lawson Rd.

Alleged date of last
sludge dump was 2006



Alleged date of last
sludge dump was 2006

EXHIBIT F-2

Satellite image dated 5/29/2006
Forests are healthy.

Corner of
Zoar Rd. and Lawson Rd.



Forests healthy

State-owned parcels

5/29/2006

Alleged date of last
sludge dump was 2006

EXHIBIT F-3

Satellite image dated 7/15/2006
Forests are healthy.

Corner of
Zoar Rd. and Lawson Rd.



Forests healthy

State-owned parcels

7/15/2006

Alleged date of last
sludge dump was 2006

EXHIBIT F-4

Satellite image dated 2/8/2007
Forests are healthy.

Corner of
Zoar Rd. and Lawson Rd.



Forests healthy

State-owned parcels

2/8/2007

Alleged date of last
sludge dump was 2006

EXHIBIT F-5

Satellite image dated 5/29/2009
Clearings appear in forest.

Corner of
Zoar Rd. and Lawson Rd.



Clearings

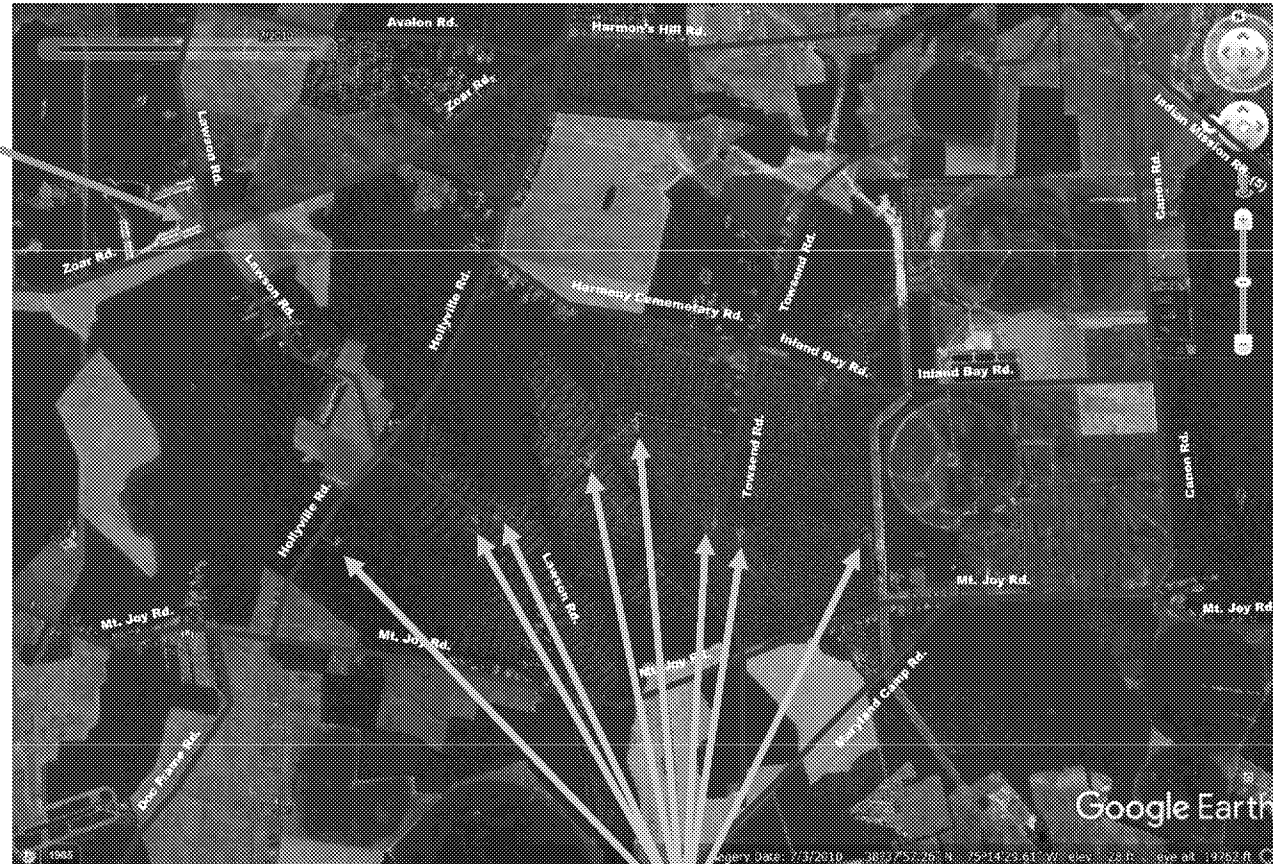
5/29/2009

Alleged date of last
sludge dump was 2006

EXHIBIT F-6

Satellite image dated 7/3/2010
Clearings appear in forest.

Corner of
Zoar Rd. and Lawson Rd.



Clearings

7/3/2010

Alleged date of last
sludge dump was 2006

EXHIBIT MF-7

Satellite image dated 6/1/2011
Clearings appear in forest.

Corner of
Zoar Rd. and Lawson Rd.

Clearings



Clearings

6/1/2011

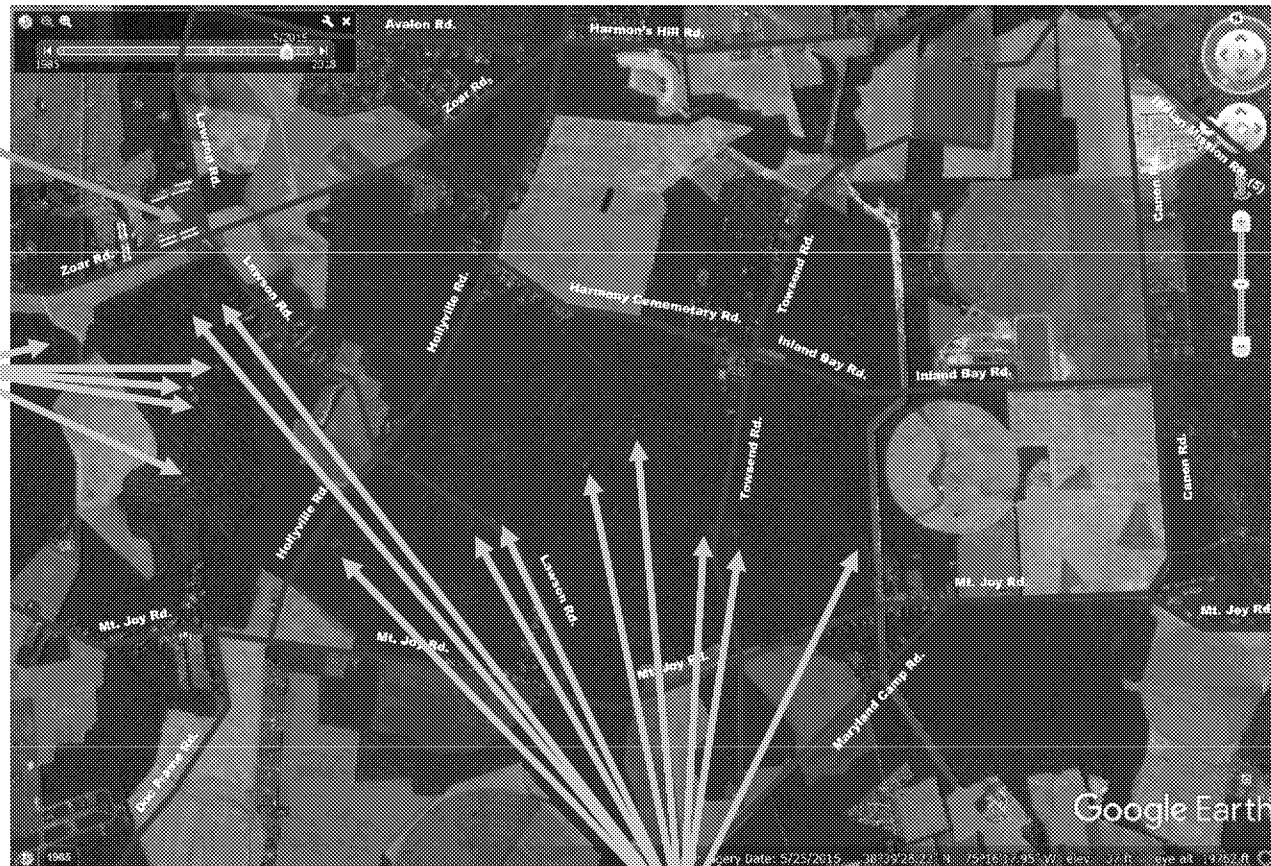
Alleged date of last
sludge dump was 2006

EXHIBIT F-8

Satellite image dated 5/25/2015
Some clearings in forest begin recovering.

Corner of
Zoar Rd. and Lawson Rd.

Clearings



Clearings

6/1/2011

Alleged date of last
sludge dump was 2006

EXHIBIT F-9

Satellite image dated 4/9/2017

State forests show recovery. Settlement area remains.

Corner of
Zoar Rd. and Lawson Rd.



4/9/2017

Alleged date of last
sludge dump was 2006

EXHIBIT F-10

Satellite image dated 6/13/2018

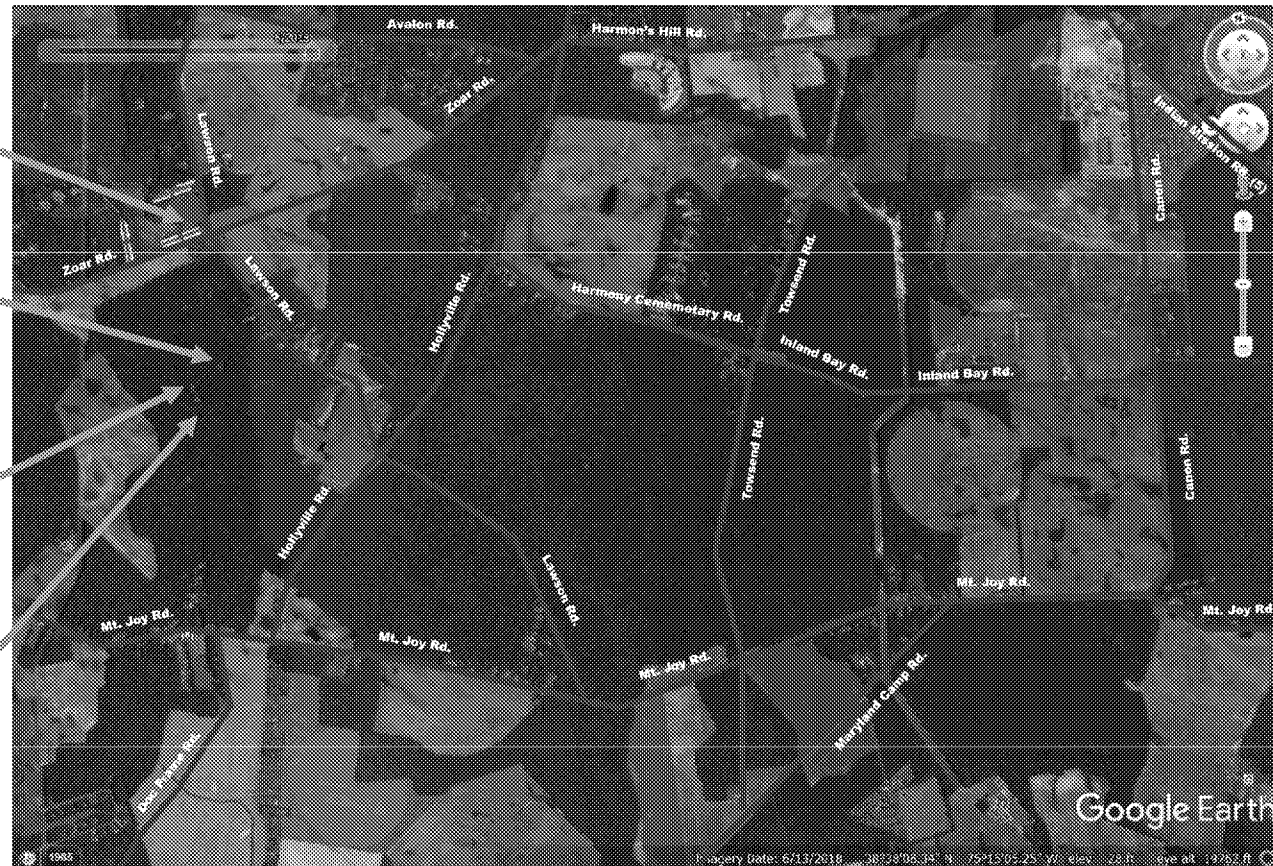
State forests show recovery. Settlement area remains.

Corner of
Zoar Rd. and Lawson Rd.

Area where I saw
abandoned mounds

Area where I saw pond
with fresh vehicle tracks
and fresh solid waste
that was missing on my
second visit

Very large recently
cleared area



6/13/2018


EXHIBIT G-1

Parcel 234-21.00-151.00 profile



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PARID: 234-21.00-151.00

ROLL: RP

SUSSEX COUNTY

Property Information

Property Location:

Unit:

City:

State:

Zip:

Class:

Use Code (UIC):

Town:

Tax District:

School District:

Council District:

Fire District:

Deeded Acres:

Frontage:

Depth:

Irr Lot:

Zoning 1:

Zoning 2:

Plot Book Page:

EXM-Exempt

LG-LOCAL GOVERNMENT

00-None

234 - INDIAN RIVER

1 - INDIAN RIVER

3-Schaeffer

83-Millsboro

230.7500

0

.000

AR-1-AGRICULTURAL/RESIDENTIAL

-

87 135/PB

100% Land Value:

100% Improvement Value:

100% Total Value:

\$10,100

\$0

\$10,100

Legal

Legal Description:

SE/RT 306

S/RT 295

PARCEL 4

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EXHIBIT G-2

Parcel 234-21.00-151.00 map

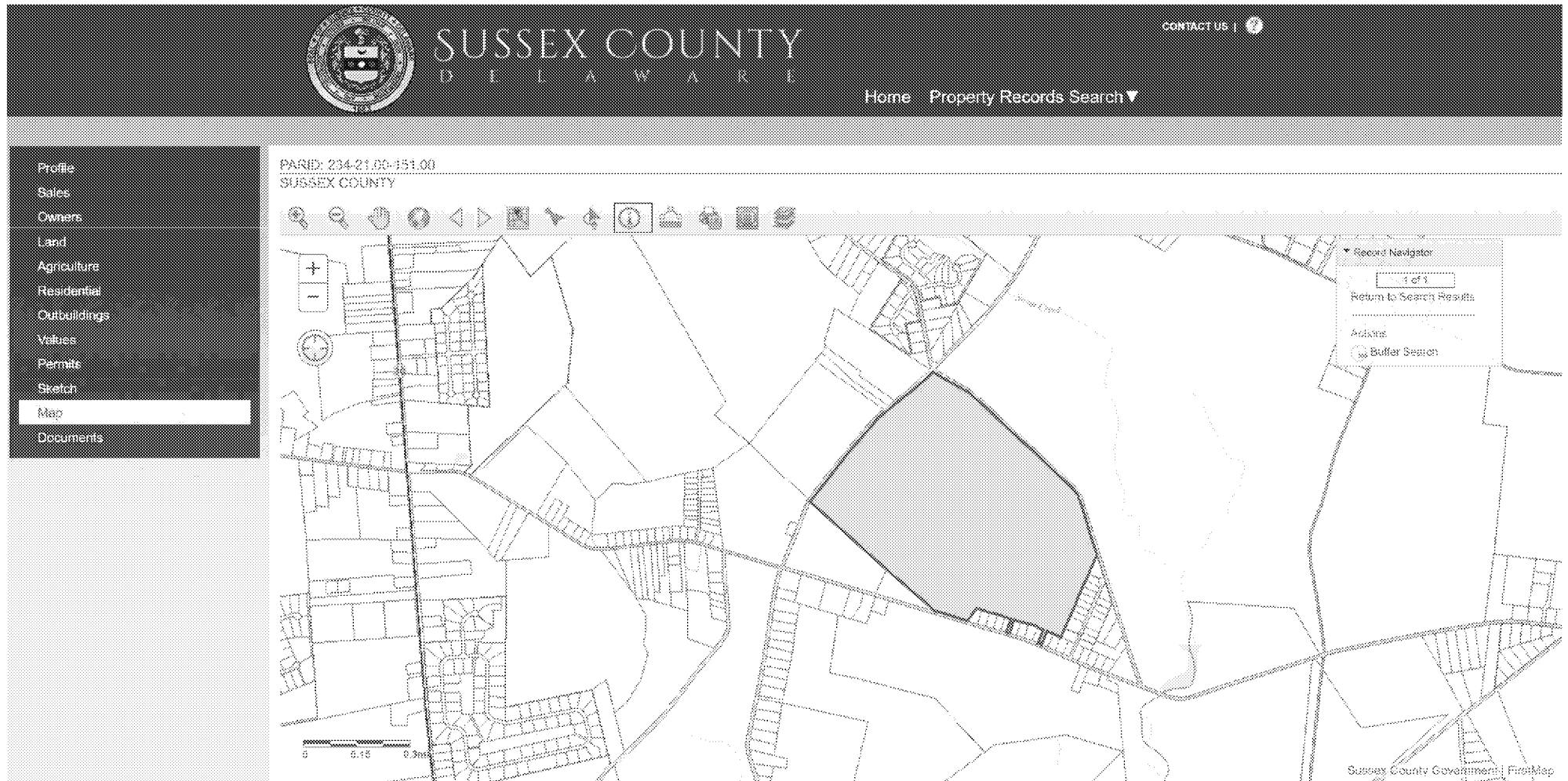


EXHIBIT G-3

No permits found for Parcel 234-21.00-151.00



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PARID: 234-21.00-151.00

SUSSEX COUNTY

ROLL: RP

-- No Data --

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EXHIBIT H-1

Parcel 234-21.00-151.03 profile



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Map

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PARID: 234-21 00-151 03

ROLL: RP

SUSSEX COUNTY

Property Information

Property Location:

Unit:

City:

State:

Zip:

Class: EXM-Exempt

Use Code (LUC): LG-LOCAL GOVERNMENT

Town: 00-None

Tax District: 234 -- INDIAN RIVER

School District: 1 - INDIAN RIVER

Council District: 3-Schaeffer

Fire District: 83-Millsboro

Deeded Acres: 600.6300

Frontage: 0

Depth: 000

Irr Lot:

Zoning 1: -

Zoning 2: -

Plot Book Page: 87 135/PB

100% Land Value: \$177,600

100% Improvement Value: \$0

100% Total Value: \$177,600

Legal

Legal Description: E/RT 305

S/RT 306

PARCEL 5

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EXHIBIT H-1

Parcel 234-21.00-151.03 map



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EXHIBIT H-3

No permits found for Parcel 234-21.00-151.03



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PARID: 234-21.00-151.03ROLL RP

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EXHIBIT I-1

Parcel 234-22.00-8.00 profile



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Sketch

Map

Documents

PARID: 234-22.00-8.00

ROLL: RP

SUSSEX COUNTY

Property Information

Property Location:

Unit:

City:

State:

Zip:

Class: EXM-Exempt

Use Code (LUC): LG-LOCAL GOVERNMENT

Town: 00-None

Tax District: 234 -- INDIAN RIVER

School District: 1 - INDIAN RIVER

Council District: 4-Hudson

Fire District: 80-Indian River

Deeded Acres: 250.7009

Frontage: 0

Depth: .000

Ir Lot:

Zoning 1: AR-1-AGRICULTURAL/RESIDENTIAL

Zoning 2: -

Plot Book Page: 67 136/PB

100% Land Value:

100% Improvement Value \$0

100% Total Value:

Legal 

Legal Description S/RT 303
E/RT 303 PARCEL 6
1996-01

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EXHIBIT I-2

Parcel 234-21.00-151.03 map



SUSSEX COUNTY

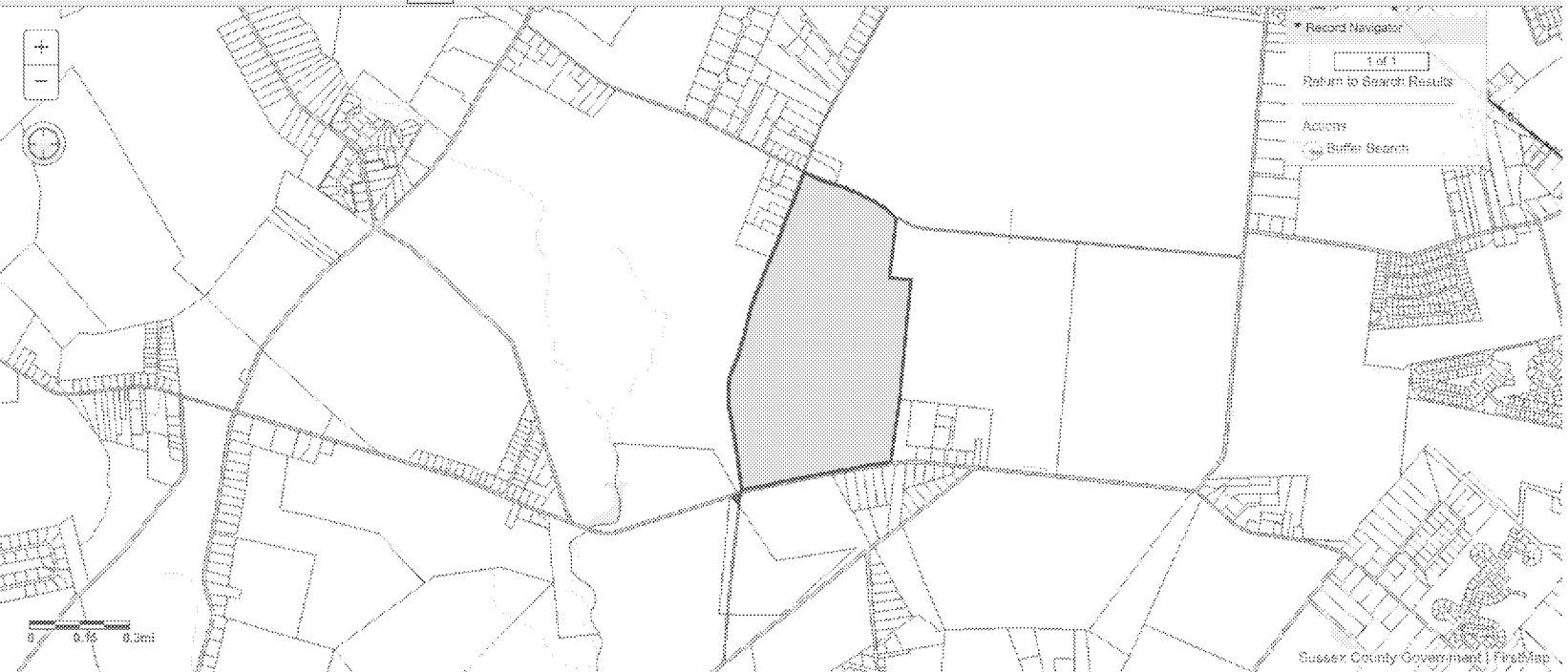

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PARID: 234-22.00-8.00
SUSSEX COUNTY



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0 0.15 0.3mi

Sussex County Government | FirstMap

EXHIBIT I-3

No permits found for Parcel 234-22.00-8.00



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PARID: 234-22.00-8.00

SUSSEX COUNTY

ROLL: RP

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